

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP, and

TAIWAN SCOTT, on behalf of himself and
all other similarly situated persons,

Plaintiffs,

v.

THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE
A. RANKIN, in his official capacity as
Chairman of the Senate Judiciary
Committee; JAMES H. LUCAS, in his
official capacity as Speaker of the House of
Representatives; CHRIS MURPHY, in his
official capacity as Chairman of the House
of Representatives Judiciary Committee;
WALLACE H. JORDAN, in his official
capacity as Chairman of the House of
Representatives Elections Law
Subcommittee; HOWARD KNAPP, in his
official capacity as interim Executive
Director of the South Carolina State Election
Commission; JOHN WELLS, Chair,
JOANNE DAY, CLIFFORD J. EDLER,
LINDA MCCALL, and SCOTT MOSELEY,
in their official capacities as members of the
South Carolina Election Commission,

Defendants.

Case No. 3-21-cv-03302-MGL-MBS-RMG

**PLAINTIFFS' SUPPLEMENTAL
RULE 26(a)(3) PRE-TRIAL
DISCLOSURES**

Pursuant to this Court's Orders of March 8, 2022, April 5, 2022, and July 21, 2022 (ECF Nos. 188, 210 & 305) and in accordance with Federal Rule of Civil Procedure 26(a)(3), Rule 26(e), and Local Rule 26.06, Plaintiffs supplement their August 26, 2022 Rule 26(a)(3) disclosures as follows.

B. WITNESS BY DEPOSITION DESIGNATIONS

In addition to the deposition testimony Plaintiffs designated on August 26, 2022 (ECF 331) and counter-designated on September 7, 2022 (ECF 364), Plaintiffs identify the following witnesses whose testimony Plaintiffs expect to present by deposition:

1. Patrick Dennis (Deposition 9/9): 7:10-10:1, 14:1-29:1, 31:18-32:14, 32:25-46:21, 47:9-57:17, 58:8-65:1, 67:19-116:8, 116:16-121:16, 122:1-132:20, 133:1-191:7, 191:19-201:24, 202:8-216:21, 217:2-257:7, 257:11-272:25, 274:23-301:14, 302:2-305:21. Exhibits 2,6,10,14 &15
2. Senator Scott Talley (Deposition 9/15): 5:12-18, 13:8 - 16:17, 20:9 - 20:18, 20:25 - 25:14, 25:20 - 30:20, 31:13 - 54:4, 54:13 - 81:21, 82:20 - 86:10, 86:19 - 96:3, 96:13 - 98:11. Exhibit 11
3. Dalton Oldman (Deposition 9/23): 4:9-5:3, 5:23-6:3, 13:19-15:10, 15:23-17:16, 19:3-16, 25:13-26:12, 27:22-31:11, 31:25-34:8, 34:19-39:4, 40:3-41:19, 41:24-44:15, 50:18-51:17, 55:12-57:22, 64:19-65:7, 67:9-21, 69:5-19, 74:12-76:17, 78:15-89:18, 91:25-93:17, 95:13-99:5, 99:10-102:24, 103:4-22, 104:25-105:7, 105:16-110:8, 110:16-111:17, 112:11-17, 112:22-113:16, 114:7-116:13, 116:19-119:16, 120:19-125:7, 127:21-128:7, 128:19-132:23, 133:15-138:22, 139:7-22, 143:9-146:16, 147:18-150:2, 150:18-154:9, 156:3-160:8, 160:15-162:17, 162:25-164:18, 165:25-167:4, 168:4-169:12, 173:19-174:3. Exhibits 1,2,3,4 &5

C. LIST OF PLAINTIFFS' EXHIBITS

Plaintiffs' list of supplemental exhibits identified since the August 26 disclosure is set forth below:

Exhibit #	Description	Bates Number (if applicable)	Objection
710	Deposition of Patrick Dennis September 9, 2022		

Exhibit #	Description	Bates Number (if applicable)	Objection
711	Email from E. Dean to P. Dennis re: Map Room Information (Ex.6 to Dennis Deposition)	SC_House_0106830-SC_House_0106832-	
712	Email from N. Walters to P. Dennis re:fyi (Ex. 10 to Dennis Deposition)	SC_House_01111640	Hearsay; Relevance [both as to attached article, not email forwarding]
713	Minutes -House Judiciary Committee-January 10, 2022 (Ex. 14 to Dennis Deposition)	SC_House_0061978-SC_House_0061985-	
714	Email from D. Owens to Anne Parks et al re: Letter to House Speaker Jay Lucas January 26, 2022 (Ex. 15 to Dennis Deposition)	SC_House_0109234-SC_House_0109237-	Hearsay; Relevance
715	Deposition of Scott Talley September 15, 2022		
716	2021 Redistricting Guidelines-South Carolina Senate Judiciary Committee Redistricting Subcommittee-September 17, 2021 (Ex. 2 to Talley Deposition)		
717	Senate Redistricting 2021 Public Hearing Schedule (Ex. 3 to Talley Deposition)	SCSENATE_00003403-SCSENATE_00003404	
718	South Carolina Congressional Districts House Plan 2 Senate Amendment 2 (Ex. 8 to Talley Deposition)		
719	South Carolina Congressional Districts House Plan 2 Senate Amendment 2a (Ex. 12 to Talley Deposition)		
720	Deposition of Dale Oldham. September 23, 2022		
721	Emails from R. Opperman to W. Roberts and A. Fiffick re: reports	SCSENATE_00003251-3259	

Dated: September 30, 2022

Respectfully submitted,

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** Admitted Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2022, a true and correct copy of the foregoing was served on all counsel of record by filing with the Court's CM/ECF service.

/s/ Allen Chaney_____
Allen Chaney